



# CPSIA Section 103

## Permanent Tracking Label Requirement

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# Why Are We Here?

- Americans should “Know What They Have, Where it Came From, and Know What to Do”
- Permanent distinguishing marks protect the consumer and the manufacturer/importer
- CPSC data, since August 2008, shows a recall in toys and juvenile products, on average, every 2.1 calendar days
- A controlled process of testing AND permanent marks builds trust and confidence
- Our comments are based on first person, industry, government, and in-country experience
- Permanent labeling is wholly and entirely practicable by August 2009

# Is it Safe? The Consumers Right to Know



Is it the same as what has  
been tested/certified?





# Can the manufacturer or importer Assure?

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# Product Awareness

- Uniqueness from origin is the only way to provide integrity and sufficiency
- CPSIA requirements protect against counterfeit, tamper, diversion, fraud, and IP violations
- A single window of data in ITDS
- There can be no guesswork for minimum mandatory requirements
- Mitigates recall risk for the consumer and manufacturer
- More intelligence and predictability based on existing supply chain capabilities
- Enhances purchase, proper use, and disposal
- Electronic data available 24/7 worldwide

# Conclusion

- CPSIA is consistent with global partners - especially Canada and the EU
- There is a Public-Congressional mandate
- Permanency and Uniqueness combined are the only path to assure Health and Safety
- First recommended in 2007 President's Plan, no further time is needed
- Substantial business value to enhanced consumer confidence...it matters
- CPSC should NOT stay the August 2009 requirement